### STODDARD LAW OFFICE

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GLENN M. STODDARD OFFICE: (715) 913-0043 DIRECT: (715) 864-3057

August 23, 2016

Via U.S. Mail & Email: tcabush@kasdorf.com

Attorney Thomas A. Cabush Kasdorf, Lewis & Swietlik One Park Plaza 11270 West Park Place, 5<sup>th</sup> Floor Milwaukee, WI 53224

Re:

Thomas E. Nelson, et al. v. William Defoe, et al.,

U.S. District Court for the Western District of Wisconsin

Case No. 15-cv-274-wmc

Dear Mr. Cabush:

Enclosed please find Plaintiffs' Notice of Acceptance of Offer of Judgment, pursuant to Rule 68, in the above-captioned case.

Please contact me to discuss entry of Judgment and terms of payment.

Sincerely,

STODDARD LAW OFFICE

Glenn M. Stoddard

Enclosure

cc: Attorney Carol N. Skinner (via email only)

Clients (via email only)

# UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF WISCONSIN

THOMAS E. NELSON, KIRSTEN L. PEDERSEN, Individually and as next friends and guardians of JACK A. NELSON, and SYLVIA E. NELSON,

Plaintiffs,

V.

Case No. 15-CV-274

WILLIAM DEFOE, In his individual and official capacities, GREGORY B. NELSON, In his individual and official capacities, JAMES PATTERSON, In his individual and official capacities, MIKE ANDERSON, In his individual and official capacities, MICHAEL CHILDERS, In his individual and official capacities, MIKE STARCK, In his individual and official capacities, JAMES M. PRICE, JR., In his individual and official capacities, LISA POTSWALD, In her individual and official capacities, and TOWN OF LA POINTE, WISCONSIN,

Defendants.

#### PLAINTIFFS' NOTICE OF ACCEPTANCE OF OFFER OF JUDGMENT

TO: Defendant Town of La Pointe, Wisconsin c/o Attorney Thomas A. Cabush Kasdorf, Lewis & Swietlik, S.C.
One Park Plaza, Suite 500
11270 West Park Place
Milwaukee, WI 53224
Attorneys for Defendants William Defoe, Gregory B. Nelson, James Patterson, Mike Anderson, Michael Childers, Mike Starck, James M. Price, Jr., Lisa Potswald, and Town of La Pointe, Wisconsin

PLEASE TAKE NOTICE that pursuant to Rule 68 of the Federal Rules of Civil Procedure, Plaintiffs Thomas E. Nelson and Kirsten L. Pedersen, individually and as next friends and guardians of Jack A. Nelson and Sylvia E. Nelson, by their attorneys, Glenn M. Stoddard, of Stoddard Law Office, and Carol N. Skinner, of Skinner and Associates, hereby accept the "Offer of Judgment" made by Defendant Town of La Pointe, dated August 17, 2016, in the total sum of Three Hundred Thousand Dollars (\$300,000.00), a copy of which is attached hereto as Exhibit 1.

Dated this 23<sup>rd</sup> day of August, 2016.

STODDARD LAW OFFICE

Glenn M. Stoddard Attorney for Plaintiffs WI State Bar No. 1020964

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CO-COUNSEL: SKINNER AND ASSOCIATES

By: /s/Carol N. Skinner
Carol N. Skinner
WI State Bar No. 1017307
Attorney for Plaintiff
212 Commercial Street
Hudson, WI 54016

Tel: (715) 386-5800

Email: cskinner@skinnerlaw.com

## UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WISCONSIN

THOMAS E. NELSON, KIRSTEN L. PEDERSEN, Individually and as next friends and guardians of JACK A. NELSON and SYLVIA E. NELSON,

Case No. 15-CV-274

Plaintiffs,

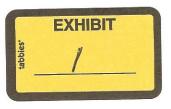
V.

WILLIAM DEFOE, in his individual and official capacities, GREGORY B. NELSON, in his individual and official capacities, JAMES PATTERSON, in his individual and official capacities, MIKE ANDERSON, in his individual and official capacities, MICHAEL CHILDERS, in his individual and official capacities, MIKE STARCK, in his individual and official capacities, JAMES M. PRICE, JR., in his individual and official capacities, LISA POTSWALD, in her individual and official capacities, and TOWN OF LA POINTE, WISCONSIN,

Defendants.

#### **OFFER OF JUDGMENT**

Pursuant to Rule 68 of the Federal Rules of Civil Procedure, the defendant, Town of La Pointe, offers to allow judgment to be taken against it in the total sum of Three Hundred Thousand and No/100ths Dollars (\$300,000.00), which includes all costs, attorney's fees and any and all other items of damage or expense that the plaintiffs may seek to recover in this lawsuit against all remaining defendants. This offer includes all liens.



Dated this 17th day of August, 2016.

KASDORF, LEWIS & SWIETLIK, S.C. Attorneys for Defendants, William Defoe, Gregory B. Nelson, James Patterson, Mike Anderson, Michael Childers, Mike Starck, James M. Price, Jr., Lisa Potswald and Town of La Pointe, Wisconsin

By:

Thomas A. Cabush State Bar No. 1019433

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